INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We make Indiana a cleaner, healthier place to live.

Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P. O. Box 6015
Indianapolis, Indiana 46206-6015

(317) 232-8603
(800) 451-6027
www.state.in.us/idem

MINOR SOURCE OPERATING PERMIT
OFFICE OF AIR QUALITY

Haulmark Industries, Inc.
19224 C.R. 8
Bristol, Indiana 46507

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the emission units described in Section A (Source Summary) of this permit.

This permit is issued to the above mentioned company under the provisions of 326 IAC 2-1.1, 326 IAC 2-6.1 and 40 CFR 52.780, with conditions listed on the attached pages.

Operation Permit No.: MSOP 039-15406-00253	
Issued by: Original signed by Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:November 26, 2002 Expiration Date:November 26, 2007

TABLE OF CONTENTS

SECTION A SOURCE SUMMARY
- A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]
- A.2 Emission Units and Pollution Control Equipment Summary

SECTION B GENERAL CONSTRUCTION CONDITIONS
- B.1 Permit No Defense [IC13]
- B.2 Definitions
- B.3 Effective Date of the Permit [IC13-15-5-3]
- B.4 Modification to Permit [326 IAC 2]
- B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]
- B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]
- B.7 Preventive Maintenance Plan [326 IAC 1-6-3]
- B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]
- B.9 Inspection and Entry [326 IAC 2-5.1(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]
- B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]
- B.11 Annual Fee Payment [326 IAC 2-1.1-7]

SECTION C SOURCE OPERATING CONDITIONS
- C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]
- C.2 Permit Revocation [326 IAC 2-1-9]
- C.3 Opacity [326 IAC 5-1]
- C.4 Fugitive Dust Emissions [326 IAC 6-4]
- C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

Testing Requirements
- C.6 Performance Testing [326 IAC 3-6]

Compliance Requirements [326 IAC 2-1.1-11]
- C.7 Compliance Requirements [326 IAC 2-1.1-11]
- C.8 Compliance Monitoring [326 IAC 2-1.1-11]
- C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]
- C.10 Compliance Response Plan - Preparation and Implementation

Record Keeping and Reporting Requirements [326 IAC 1-6-2]
- C.11 Malfunctions Report [326 IAC 1-6-2]
- C.12 Emission Statement [326 IAC 2-6]
- C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]
- C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS
- D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]
- D.1.2 Volatile Organic Compounds (VOC)
- D.1.3 Hazardous Air Pollutants (HAPs)
- D.1.4 Particulate [326 IAC 6-3-2(d)]
- D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

Compliance Determination Requirements
- D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

TABLE OF CONTENTS (Continued)

D.1.7 Testing Requirements [326 IAC 2-1.1-11]
D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)
D.1.9 VOC and HAP

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]
D.1.10 Record Keeping Requirements

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Emission Limitations and Standards

Annual Notification
Malfunction Report

SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.2 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom cargo trailer manufacturing plant.

Authorized Individual:	Trace Cole
Source Address:	19224 C.R. 8, Bristol, Indiana 46507
Mailing Address:	P.O. Box 281, Bristol, Indiana 46507
General Source Phone:	(574) 825-5867
SIC Code:	3715
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

A.2 Emission Units and Pollution Control Equipment Summary

This stationary source is approved to operate the following emission units and pollution control devices:

(a) One (1) spray paint booth, identified as E1, constructed in 1995, equipped with one (1) HVLP spray gun, for metal cargo trailer coating, with a maximum capacity of 0.68 units per hour, using dry filters for overspray control, and exhausting to stack S1.

(b) One (1) general assembly area for the assembling of metal cargo trailers, with a maximum capacity of 0.68 units per hour, identified as GE, constructed in 1995, exhausting to general ventilation.

(c) Ten (10) metal inert gas welding stations, constructed in 1995, with a maximum throughput of 0.27 pounds of welding wire per hour per station.

(d) Twenty (27) natural gas space heaters, constructed in 1995, with a total maximum rated capacity of 3.42 MMBtu per hour.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC13]

This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated there under, as well as other applicable local, state, and federal requirements.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulation IC 13-11, 326 IAC 1-2, and 326 2-1.1-1 shall prevail.

B.3 Effective Date of the Permit [IC13-15-5-3]

Pursuant to IC 13-15-5-3, this permit becomes effective upon its issuance.

B.4 Modification to Permit [326 IAC 2]

All requirements and conditions of this construction permit shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

B.5 Permit Term and Renewal [326 IAC 2-6.1-7(a)][326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions of this permit do not affect the expiration date.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

B.6 Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or

before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

B.7 Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMPs) within sixty (60) days after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the PMPs as necessary to ensure that failure to implement the a PMP does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or contributes to any violation. The PMP does not require the certification by an "authorized individual as defined by 326 IAC 2-1.1-1(1).

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

B.8 Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) Permit revisions are governed by the requirements of 326 IAC 2-6.1-6.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management

Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

B.9 Inspection and Entry [326 IAC 2-5.1(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.10 Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATING CONDITIONS

Entire Source

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P] [326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

C.2 Permit Revocation [326 IAC 2-1.1-9]

Pursuant to 326 IAC 2-1.1-9 (Revocation of Permits), this permit to contruct and operate may be revoked for any of the following causes:

(a) Violation of any conditions of this permit.

(b) Failure to disclose all the relevant facts, or misrepresentation in obtaining this permit.

(c) Changes in regulatory requirements that mandate either a temporary or permanent reduction of discharge of contaminants. However, the amendment of appropriate sections of this permit shall not require revocation of this permit.

(d) Noncompliance with orders issued pursuant to 326 IAC 1-5 (Episode Alert Levels) to reduce emissions during an air pollution episode.

(e) For any cause which establishes in the judgment of IDEM, the fact that continuance of this permit is not consistent with purposes of this article.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.4 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015
(and local agency if applicable)

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an “authorized individual” as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

Testing Requirements

C.6 Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date.

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date.

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

C.8 Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented no more than ninety (90) days after issuance of this permit.

C.9 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60, Appendix B, 40 CFR 63, or other approved methods as specified in this permit.

C.10 Compliance Response Plan - Preparation and Implementation

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected timeframe for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, the IDEM, OAQ shall be promptly notified of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall constitute a violation of the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) The Permittee shall record all instances when response steps are taken.

(e) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

Record Keeping and Reporting Requirements [326 IAC 1-6-2]

C.11 Malfunctions Report [326 IAC 1-6-2]

Pursuant to 326 IAC 1-6-2 (Records; Notice of Malfunction):

(a) A record of all malfunctions, including startups or shutdowns of any facility or emission control equipment, which result in violations of applicable air pollution control regulations or applicable emission limitations shall be kept and retained for a period of three (3) years and shall be made available to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) or appointed representative upon request.

(b) When a malfunction of any facility or emission control equipment occurs which lasts more than one (1) hour, said condition shall be reported to OAQ, using the Malfunction Report Forms (2 pages). Notification shall be made by telephone or facsimile, as soon as practicable, but in no event later than four (4) daytime business hours after the beginning of said occurrence.

(c) Failure to report a malfunction of any emission control equipment shall constitute a violation of 326 IAC 1-6, and any other applicable rules. Information of the scope and expected duration of the malfunction shall be provided, including the items specified in 326 IAC 1-6-2(a)(1) through (6).

(d) Malfunction is defined as any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner. [326 IAC 1-2-39]

C.12 Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate estimated actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate estimated actual emissions of other regulated pollutants (as defined by 326 IAC 2-7-1) from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality'

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

C.13 General Record Keeping Requirements [326 IAC 2-6.1-5]

(a) Records of all required data, reports and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented when operation begins.

C.14 General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. Reporting periods are based on calendar years.

SECTION D.1 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(a) One (1) spray paint booth, identified as E1, equipped with one (1) HVLP spray gun, for metal cargo trailer coating, with a maximum capacity of 0.68 units per hour, using dry filters for overspray control, and exhausting to stack S1.

(b) One (1) general assembly area for the assembling of metal cargo trailers, with a maximum capacity of 0.68 units per hour, identified as GA, exhausting to general ventilation.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coatings applied in the spray paint booth (E1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as applied for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings or extreme performance coatings.

Solvent sprayed from HVLP application equipment in the paint booth during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

D.1.2 Volatile Organic Compounds (VOC)

The potential to emit volatile organic compounds (VOC) from the spray paint booth (E1) and general assembly area (GA) is less than one hundred (100) tons per year. Therefore, 326 IAC 2-7 does not apply. Any change or modification which increases the potential emissions to equal to or greater than one hundred (100) tons per year must be approved by IDEM, OAQ before any change is made.

D.1.3 Hazardous Air Pollutants (HAPs)

The potential to emit hazardous air pollutants (HAPs) from the spray paint booth (E1) and the general assembly area (GE) is less than ten (10) ten tons per year of a single HAP and less than twenty-five (25) tons per year of combined HAPs. Therefore, 326 IAC 2-7 will not apply. Any change or modification which may increase to potential emissions to ten (10) tons per year of a single HAP or twenty-five (25) tons per year of any combination of HAPs must be approved by IDEM, OAQ before any such change may occur.

D.1.4 Particulate [326 IAC 6-3-2(d)]

(a) Particulate from the surface coating shall be controlled by a dry particulate filter and the control device shall be operated in accordance with the manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates o the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground.

D.1.5 Preventive Maintenance Plan [326 IAC 1-6-3]

A Preventive Maintenance Plan, in accordance with Section C - Preventive Maintenance Plan, of this permit, is required for these emission units and their control devices.

Compliance Determination Requirements

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

$$A = [\ 3\ C\ x\ U) / 3\ U]$$

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

D.1.7 Testing Requirements [326 IAC 2-1.1-11]

The Permittee is not required to test this emissions unit by this permit. However, IDEM may require compliance testing when necessary to determine if the emissions unit is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

D.1.8 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAP)

Compliance with the VOC content and usage limitations contained in Condition D.1.1, D.1.2, and D.1.3 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer.

D.1.9 VOC and HAP

Compliance with Condition D.1.2 and D.1.3 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound and hazardous air pollutant usage for the twelve (12) month period.

Record Keeping and Reporting Requirements [326 IAC 2-5.1-3(e)(2)] [326 IAC 2-6.1-5(a)(2)]

D.1.10 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, D.1.2, and D.1.3.

(1) The VOC and HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The volume weighted VOC content of the coatings used for each month;

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(c) Ten (10) metal inert gas welding stations with a maximum throughput of 0.27 pounds of welding wire per hour per station.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

There are no specific regulations applicable to there units.

SECTION D.3 EMISSIONS UNIT OPERATION CONDITIONS

Facility Description:

(d) Twenty (27) natural gas space heaters with a total maximum rated capacity of 3.42 MMBtu per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards

There are no specific regulations applicable to these units.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
Compliance Branch
(Include local agency when applicable)

MINOR SOURCE OPERATING PERMIT
ANNUAL NOTIFICATION

This form should be used to comply with the notification requirements under 326 IAC 2-6.1-5(a)(5).

Company Name:	**Haulmark Industries, Inc.**
Address:	**19224 C.R. 8**
City:	**Bristol, Indiana 46507**
Phone #:	**(219) 825-5867**
MSOP #:	**039-15406-00253**

I hereby certify that Haulmark Industries, Inc. is
- **9** still in operation.
- **9** no longer in operation.

I hereby certify that Haulmark Industries, Inc. is
- **9** in compliance with the requirements of MSOP 039-15406-00253.
- **9** not in compliance with the requirements of MSOP 039-15406-00253.

Authorized Individual (typed):
Title:
Signature:
Date:

If there are any conditions or requirements for which the source is not in compliance, provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be achieved.

Noncompliance:

MALFUNCTION REPORT

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
FAX NUMBER - 317 233-5967

This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

THIS FACILITY MEETS THE APPLICABILITY REQUIREMENTS BECAUSE IT HAS POTENTIAL TO EMIT 25 TONS/YEAR PARTICULATE MATTER ?_____, 25 TONS/YEAR SULFUR DIOXIDE ?_____, 25 TONS/YEAR NITROGEN OXIDES?_____, 25 TONS/YEAR VOC ?_____, 25 TONS/YEAR HYDROGEN SULFIDE ?_____, 25 TONS/YEAR TOTAL REDUCED SULFUR ?_____, 25 TONS/YEAR REDUCED SULFUR COMPOUNDS ?_____, 25 TONS/YEAR FLUORIDES ?_____, 100TONS/YEAR CARBON MONOXIDE ?_____, 10 TONS/YEAR ANY SINGLE HAZARDOUS AIR POLLUTANT ?_____, 25 TONS/YEAR ANY COMBINATION HAZARDOUS AIR POLLUTANT ?_____, 1 TON/YEAR LEAD OR LEAD COMPOUNDS MEASURED AS ELEMENTAL LEAD ?_____, OR IS A SOURCE LISTED UNDER 326 IAC 2-5.1-3(2) ?_____. EMISSIONS FROM MALFUNCTIONING CONTROL EQUIPMENT OR PROCESS EQUIPMENT CAUSED EMISSIONS IN EXCESS OF APPLICABLE LIMITATION _____.

THIS MALFUNCTION RESULTED IN A VIOLATION OF: 326 IAC _____ OR, PERMIT CONDITION # _____ AND/OR PERMIT LIMIT OF _____

THIS INCIDENT MEETS THE DEFINITION OF 'MALFUNCTION' AS LISTED ON REVERSE SIDE ? Y N

THIS MALFUNCTION IS OR WILL BE LONGER THAN THE ONE (1) HOUR REPORTING REQUIREMENT ? Y N

COMPANY:_____PHONE NO. ( )_____
LOCATION: (CITY AND COUNTY)_____
PERMIT NO. _____ AFS PLANT ID: _____ AFS POINT ID: _____ INSP:_____
CONTROL/PROCESS DEVICE WHICH MALFUNCTIONED AND REASON:_____

DATE/TIME MALFUNCTION STARTED: _____/_____/ 20____ _____ AM / PM

ESTIMATED HOURS OF OPERATION WITH MALFUNCTION CONDITION: _____

DATE/TIME CONTROL EQUIPMENT BACK-IN SERVICE_____/_____/ 20____ _____ AM/PM

TYPE OF POLLUTANTS EMITTED: TSP, PM-10, SO2, VOC, OTHER:_____

ESTIMATED AMOUNT OF POLLUTANT EMITTED DURING MALFUNCTION: _____

MEASURES TAKEN TO MINIMIZE EMISSIONS:_____

REASONS WHY FACILITY CANNOT BE SHUTDOWN DURING REPAIRS:

CONTINUED OPERATION REQUIRED TO PROVIDE ESSENTIAL* SERVICES:_____
CONTINUED OPERATION NECESSARY TO PREVENT INJURY TO PERSONS:_____
CONTINUED OPERATION NECESSARY TO PREVENT SEVERE DAMAGE TO EQUIPMENT:_____
INTERIM CONTROL MEASURES: (IF APPLICABLE)_____

MALFUNCTION REPORTED BY:_____TITLE:_____
(SIGNATURE IF FAXED)

MALFUNCTION RECORDED BY:_____DATE:_____TIME:_____

*SEE PAGE 2

Please note - This form should only be used to report malfunctions applicable to Rule 326 IAC 1-6 and to qualify for the exemption under 326 IAC 1-6-4.

326 IAC 1-6-1 Applicability of rule

Sec. 1. This rule applies to the owner or operator of any facility required to obtain a permit under 326 IAC 2-5.1 or 326 IAC 2-6.1.

326 IAC 1-2-39 "Malfunction" definition

Sec. 39. Any sudden, unavoidable failure of any air pollution control equipment, process, or combustion or process equipment to operate in a normal and usual manner.

***Essential services** are interpreted to mean those operations, such as, the providing of electricity by power plants. Continued operation solely for the economic benefit of the owner or operator shall not be sufficient reason why a facility cannot be shutdown during a control equipment shutdown.

If this item is checked on the front, please explain rationale:

_____

_

_____

_

PAGE 2 OF 2

November 26, 2002

Indiana Department of Environmental Management
Office of Air Quality

Addendum to the Technical Support Document
for Minor Source Operating Permit (MSOP)

Source Background and Description

Source Name:	Haulmark Industries, Inc. - Special Products Plant
Source Location:	19224 C.R. 8, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3715
Operation Permit No.:	039-15406-00253
Permit Reviewer:	ERG/EH

On September 23, 2002 the Office of Air Quality (OAQ) had a notice published in the Elkhart Truth, Elkhart, Indiana stating that Haulmark Industries, Inc. - Special Products Plant had applied for a Minor Source Operating Permit (MSOP) to operate a custom cargo trailer manufacturing plant. The notice also stated that OAQ proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 23, 2002, Mr. Michael Cira from Bruce Carter Associates submitted suggested comments and corrections on behalf of the source.

Comment 1: The authorized individual listed in section A.l should be changed to Trace Cole. Additionally the area code should be changed to reflect the current number in use.

Response to Comment 1: A general phone number is used because it is cumbersome to do a notice only change every time a contact person's phone number changes. The following changes were made to section A.1. Additional changes are shown that will be discussed later in this document.

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom cargo trailer manufacturing plant.

Authorized Individual:	~~Haulmark Industries, Inc.~~ **Trace Cole**
Source Address:	19224 C.R. 8, Bristol, Indiana 46507
Mailing Address:	P.O. Box 281, Bristol, Indiana 46507
General Source Phone :	~~(219)~~ **(574)** 825-5867
SIC Code:	3715
County Location:	Elkhart
Source Location Status:	Attainment for all criteria pollutants
Source Status:	Minor Source Operating Permit Minor Source, under PSD Rules Minor Source, Section 112 of the Clean Air Act Not 1 of 28 Source Categories

Comment 2: The commenter stated that Condition C.10 does not allow for time to implement the required changes to the monitoring and record keeping that was not previously legally required. Please make changes to this section to allow time for implementation time.

Response to Comment 2: Compliance Monitoring was changed to allow implementation time.

C.~~10~~ **8** Compliance Monitoring [326 IAC 2-1.1-11]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment. All monitoring and record keeping requirements not already legally required shall be implemented ~~when operation begins.~~ **no more than ninety (90) days after issuance of this permit.**

Comment 3: The commenter stated that reference of "..as applied for any calendar day.." in association with the 3.5. pounds of VOC per gallon is not required as part of the regulations, and therefore should be eliminated. In addition, the alternative of using extreme performance coating should be included.

Response to Comment 3: The phrase "...as applied for any calendar day.." in D.1.1 Volatile Organic Compound (VOC) can not be eliminated from this condition. Haulmark uses coatings both above and below 3.5 lb VOC/gallon coating. In order to comply with the 3.5 lb VOC/gallon emission limitation required by Condition D.1.1, the source can achieve compliance using the method outlined in 326 8-1-2(a)(7). This regulation allows the source to use a daily volume-weighted average of all coatings applied each calendar day to demonstrate compliance with the 3.5 lb VOC/gallon limit. The use of extreme performance coating can be included, therefore, D.1.1 has been changed as follows:

D.1.1 Volatile Organic Compound (VOC) [326 IAC 8-2-9]

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coatings applied in the spray paint booth (E1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as applied for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings **or extreme performance coatings**.

Comment 4: The commenter stated that the requirement for a log of the date of use is not required in the situation as described in D.1.11.

Response to Comment 4: It is necessary that records be kept to ensure that the Permittee is in compliance with conditions D.1.1, D.1.2, and D.1.3. This record is needed to ensure compliance with the emission limit that is averaged on a daily basis in Condition D.1.1. However, IDEM, OAQ has revised D.1.11(a)(2) to clarify its meaning; also a new condition has been added to specify how the volume weighted average should be calculated.

D.1.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2]

Compliance with the VOC content limit in condition D.1.1 shall be determined pursuant to 326 IAC 8-1-2(a)(7), using a volume weighted average of coatings on a daily basis. This volume weighted average shall be determined by the following equation:

A = [3 C x U) / 3 U]

Where: A is the volume weighted average in pounds VOC per gallon less water as applied;
C is the VOC content of the coating in pounds VOC per gallon less water as applied;
and U is the usage rate of the coating in gallons per day.

D.1.~~11~~**10** Record Keeping Requirements

(a) To document compliance with Conditions D.1.1, D.1.2, and D.1.3 the Permittee shall maintain records in accordance with (1) through (~~5~~6) below. Records maintained for (1) through (6) shall be taken ~~monthly~~ as stated below and shall be complete and sufficient to establish compliance with the VOC and HAP usage limits and/or the VOC and HAP emission limits established in Conditions D.1.1, D.1.2, and D.1.3.

(1) The ~~amount and~~ VOC and HAP content of each coating material and solvent used. ~~Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;~~

(2) The amount of coating material and solvent less water used on daily basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) ~~A log of the month of use~~**;The volume weighted VOC content of the coatings used for each month;**

(4) The cleanup solvent usage for each month;

(5) The total VOC and HAP usage for each month; and

(6) The weight of VOCs and HAPs emitted for each compliance period.

~~(b) To document compliance with Condition D.1.10, the Permittee shall maintain a log of weekly overspray observations, daily and monthly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.~~

(**b~~c~~**) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

Comment 5: The commenter pointed out that in the Technical Support Document, Stack Summary chart, the diameter of the stack was misstated. The correct diameter is 24 inches, or 2 feet. The corrected chart should appear as follows:

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
E-1	HVLP Paint Booth	24	~~24~~ **2.0**	12,800	70

Response to Comment 5: No changes have been made to the TSD because the OAQ prefers that the Technical Support Document reflect the permit that was on public notice. Changes to the permit or technical support material that occur after the public notice are documented in this Addendum to the Technical Support

Document. This accomplishes the desired result of ensuring that these types of concerns are documented and part of the record regarding this permit decision.

Upon further review, the OAQ has decided to make the following revisions to the permit (bolded language has been added, the language with a line through it has been deleted). The Table Of Contents has been modified, if applicable, to reflect these changes.

1. A general phone number is used because it is cumbersome to do a notice only change every time a contact person's phone number changes. The following change was made to section A.1:

A.1 General Information [326 IAC 2-5.1-3(c)] [326 IAC 2-6.1-4(a)]

The Permittee owns and operates a stationary custom cargo trailer manufacturing plant.

Authorized Individual:	~~Haulmark Industries, Inc.~~ **Trace Cole**
Source Address:	19224 C.R. 8, Bristol, Indiana 46507
Mailing Address:	P.O. Box 281, Bristol, Indiana 46507
General Source Phone :	~~(219)~~ **(574)** 825-5867

2. The following change was made to clarify condition D.1.3 Hazardous Air Pollutants (HAPs):

D.1.3 Hazardous Air Pollutants (HAPs)

The potential to emit hazardous air pollutants (HAPs) from the spray paint booth (E1) and the general assembly area (GE) is less than ten (10) ten tons per year of a single HAP and less than twenty-five (25) tons per year **of combined HAPs**.

3. Section B has been renamed to simply "General Conditions", since the permit may or may not include construction.

SECTION B GENERAL ~~CONSTRUCTION~~ CONDITIONS

4. B.2 (Definitions) has been revised for clarification purposes.

B.2 Definitions

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, ~~any~~ **the** applicable definitions found in **the statutes or regulation** IC 13-11, 326 IAC 1-2, and 326 2-1.1-1 shall prevail.

5. B.5 (Permit Term and Renewal) has been revised and clarified to specify when a renewal application is due.

B.5 Permit Term **and Renewal** [326 IAC 2-6.1-7**(a)**] **[326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the ~~original~~ **issuance** date **of this permit**, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, ~~modifications or amendments~~ of this permit do not affect the expiration **date**.

The Permittee shall apply for an operation permit renewal at least ninety (90) days prior to the expiration date. If a timely and sufficient permit application for a renewal has been made, this permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

6. The Annual Notification has been moved to Section B from Section C.

~~C.18~~**B.6** Annual Notification [326 IAC 2-6.1-5(a)(5)]

(a) Annual notification shall be submitted to the Office of Air Quality stating whether or not the source is in operation and in compliance with the terms and conditions contained in this permit.

(b) Noncompliance with any condition must be specifically identified. If there are any permit conditions or requirements for which the source is not in compliance at any time during the year, the Permittee must provide a narrative description of how the source did or will achieve compliance and the date compliance was, or will be, achieved. The notification must be signed by an authorized individual.

(c) The annual notice shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in the format attached no later than March 1 of each year to:

Compliance Branch, Office of Air Quality
Indiana Department of Environmental Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(d) The notification shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

7. Preventive Maintenance Plan has been moved to Section B from Section C. The language "Preventive Maintenance Plans" has been replaced with "PMPs" throughout the condition, since it has already been defined. Language was added giving the source a reasonable time to provide a PMP .

~~C.2~~ **B.7** Preventive Maintenance Plan [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP**s**) **within sixty (60) days** after issuance of this permit, including the following information on each emissions unit:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If, due to circumstances beyond the Permittee's control, the PMPs cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

The PMP extension notification does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall implement the ~~Preventative Maintenance Plans~~ **PMPs** as necessary to ensure that failure to implement the ~~Preventative Maintenance Plan~~ **a PMP** does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) **A copy of the** PMPs shall be submitted to IDEM, OAQ, upon request **and within a reasonable time**, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMP**s** whenever lack of proper maintenance causes or contributes to any violation. **The PMP does not require the certification by an "authorized individual as defined by 326 IAC 2-1.1-1(1).**

(d) Records of preventive maintenance shall be retained for a period of at least five (5) years. These records shall be kept at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

8. Permit Revision has been moved to Section B from Section C. Permit Revision section (a) has been revised clarifying that the source is not liable for both a permit violation and a rule violation. The authorized individual has been replaced with "an authorized individual", because the rule does not specify that it has to be one individual; this change is made throughout the permit.

~~C.3~~**B.8** Permit Revision [326 IAC 2-5.1-3(e)(3)] [326 IAC 2-6.1-6]

(a) ~~The Permittee must comply with~~ **Permit revisions are governed by** the requirements of 326 IAC 2-6.1-6 ~~whenever the Permittee seeks to amend or modify this permit~~.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by ~~the~~ **an** "authorized individual" as defined by 326 IAC 2-1.1-1.

(c) The Permittee shall notify the OAQ within thirty (30) calendar days of implementing a notice-only change. [326 IAC 2-6.1-6(d)]

9. Inspection and Entry and Transfer of Ownership have both been moved from Section C to Section B.

~~C.4~~ **B.9** Inspection and Entry [326 IAC 2-5.1(e)(4)(B)] [326 IAC 2-6.1-5(a)(4)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a permitted source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under this title or the conditions of this permit or any operating permit revisions;

(c) Inspect, at reasonable times, any processes, emissions units (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit or any operating permit revisions;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

~~C.5~~**B.10** Transfer of Ownership or Operation [326 IAC 2-6.1-6(d)(3)]

Pursuant to [326 IAC 2-6.1-6(d)(3)]:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAQ, Permits Branch, within thirty (30) days of the change.

(b) The written notification shall be sufficient to transfer the permit to the new owner by a notice-only change pursuant to 326 IAC 2-6.1-6(d)(3).

(c) IDEM, OAQ, shall issue a revised permit.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1.

10. B.11 (Annual Fee Payment) condition was added to the permit to clarify the annual fee requirement.

B.11 Annual Fee Payment [326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ within thirty (30) calendar days of receipt of a billing.

(b) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4230 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

11. Section C conditions had to be renumbered due to adding, deleting or transferring conditions. C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour has been added to specify the requirements for processes with low process weight rates. Subsequent conditions have been renumbered.

C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

(a) Pursuant to 40 CFR 52 Subpart P, the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

(b) Pursuant to 326 IAC 6-3-2(e)(2), the allowable particulate emissions rate from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

12. C.1 (PSD Minor Source Status) condition has been removed from the permit. This is an informational condition that is not necessary.

~~C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]~~

~~(a) The total source potential to emit is less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.~~

~~(b) Any change or modification which may increase potential to emit to 250 tons per year from this source, shall cause this source to be considered a major source under PSD, 326 IAC 2-2 and 40 CFR 52.21, and shall require approval from IDEM, OAQ prior to making the change.~~

~~(c) Any change or modification which may increase potential to emit to ten (10) tons per year of any single hazardous air pollutant, twenty-five (25) tons per year of any combination of hazardous air pollutants, or one hundred (100) tons per year of any other regulated pollutant from this source, shall cause this source to be considered a major source under Part 70 Permit Program, 326 IAC 2-7, and shall require approval from IDEM, OAQ prior to making the change.~~

13. The Permit Revocation rule cite was corrected.

C.~~6~~ **2** Permit Revocation ~~[326 IAC 2-1-9]~~ [326 IAC 2-1.1-9]

Pursuant to ~~326 IAC 2-1-9(a)~~ **[326 IAC 2-1.1-9]** (Revocation of Permits), this permit **to construct and** operate may be revoked for any of the following causes:

14. The statement that "326 IAC 6-4-2(4) is not federally enforceable" has been removed.

C.~~8~~ **4** Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). ~~326 IAC 6-4-2(4) is not federally enforceable.~~

15. Asbestos Abatement Projects has been added to the permit to clarify that these provisions may apply.

C.5 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by an "authorized individual" as defined by 326 IAC 2-1.1-1.

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1, emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited, pursuant to the provisions of 40 CFR 61, Subpart M, is federally enforceable.

16. Performance Testing has been rearranged for clarity. Language has also been added and deleted to indicate that the test protocol and the notification of the test date do not require certification by the authorized individual.

C.~~9~~ **6** Performance Testing [326 IAC 3-6]

(a) Compliance testing on new emission units shall be conducted within 60 days after achieving maximum production rate, but no later than 180 days after initial start-up, if specified in Section D of this approval. All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. ~~The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.~~

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14 days) prior to the actual test date.

~~(b)~~ **(c) Pursuant to 326 IAC 3-6-4(b), all** ~~All~~ test reports must be received by IDEM, OAQ ~~within~~ **not later than** forty-five (45) days after the completion of the testing. An extension may be granted by the IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation ~~within~~ **not later than** five (5) days prior to the end of the initial forty-five (45) day period.

~~The documentation submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1~~

17. Compliance Requirements is a new condition that refers to general compliance authority in 326 IAC 2-1.1-11.

Compliance Requirements [326 IAC 2-1.1-11]

C.7 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

18. The rule cite 40 CFR 60 and 40 CFR 63 have been added to Monitoring Methods.

C.~~11~~ **9** Monitoring Methods [326 IAC 3] **[40 CFR 60] [40 CFR 63]**

Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, **40 CFR 60, Appendix B, 40 CFR 63** , or other approved methods as specified in this permit.

19. Compliance Response Plan - Preparation and Implementation title has been changed. The title does not contain "Records and Reports", because this condition does not refer to records and reports.

C.~~12~~**10** Compliance Response Plan - Preparation **and** Implementation, ~~Records, and Reports [326 IAC 1-6]~~

20. The Emission Statement language was added to clarify that regulated pollutants are defined in 326 IAC 2-7-1 and "estimated" was added to (a)(1) and (a)(2) because that is how 326 IAC 2-6 describes emissions.

C.~~14~~**12** ~~Annual~~ Emission Statement [326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply

with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate **estimated** actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate **estimated** actual emissions of other regulated pollutants **(as defined by 326 IAC 2-7-1)** from the source, for purposes of Part 70 fee assessment.

21. Monitoring Data Availability has been deleted.

~~C.15 Monitoring Data Availability [326 IAC 2-6.1-2] [IC 13-14-1-13]~~

~~(a) With the exception of performance tests conducted in accordance with Section C - Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.~~

~~(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.~~

~~(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.~~

~~(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.~~
~~(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.~~

~~(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.~~

22. General Record Keeping Requirements condition has been revised to be more consistent with the regulation and to clarify that a "reasonable time" will be given for the source to produce the records. "Monitoring" was removed so that the condition is more generalized to all record keeping, "reports" was added to clarify that copies of those must be kept as well. Paragraphs (b) and (c) have been removed because they did not provide additional information.

C.~~16~~**13** General Record Keeping Requirements [326 IAC 2-6.1-~~2~~ **5**]

(a) Records of all required ~~monitoring~~ data, **reports** and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years ~~and available upon the request of an IDEM, OAQ, representative~~. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a ~~written~~ request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

~~(b) Records of required monitoring information shall include, where applicable:~~

~~(1) The date, place, and time of sampling or measurements;~~

~~(2) The dates analyses were performed;~~

~~(3) The company or entity performing the analyses;~~

~~(4) The analytic techniques or methods used;~~

~~(5) The results of such analyses; and~~

~~(6) The operating conditions existing at the time of sampling or measurement.~~

~~(c) Support information shall include, where applicable:~~

~~(1) Copies of all reports required by this permit;~~

~~(2) All original strip chart recordings for continuous monitoring instrumentation;~~

~~(3) All calibration and maintenance records;~~

~~(4) Records of preventive maintenance shall be sufficient to demonstrate that failure to implement the Preventive Maintenance Plan did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.~~

(~~d~~ **b**) **Unless otherwise specified in this permit,** a ~~A~~ll record keeping requirements not already legally required shall be implemented when operation begins.

23. The General Reporting Requirements condition has been revised to clarify reporting periods.

C.~~17~~**14** General Reporting Requirements [326 IAC 2-1.1-11] [326 IAC 2-6.1-2] [IC 13-14-1-13]

(a) Reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly or semi-annual report required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. The report does not require the certification by an "authorized individual" as defined by 326 IAC 2-1.1-1(1).

~~(c)~~ **(d)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period. **Reporting periods are based on calendar years.**

24. A clarification was made to D.1.4 to indicate that particulate should be controlled instead of the surface coating being controlled. Condition D.1.4 was also revised to specify the control device being used.

D.1.4 Particulate [326 IAC 6-3-2(d)]

(a) **Particulate from the** ~~s~~**S**urface coating shall be controlled by a dry particulate filter, ~~waterwash, or an equivalent control device~~, and the control device shall be operated in accordance with the manufacturer's specifications.

25. The language of D.1.4 is redundant with conditions D.1.6 and D.1.10. The language in D.1.4 is the most current requirement as specified in 326 IAC 6-3-2. Conditions D.1.6 and D.1.10 have been deleted to clear up the redundancy.

~~D.1.6 Particulate Matter (PM)~~

~~The dry filters for PM control shall be in operation at all times when the spray booth (E1) is in operation.~~

~~D.1.10 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth (E1) stack S1 while the booth is in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan - Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.~~

~~(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

November 26, 2002

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for a Minor Source Operating Permit

Source Background and Description

Source Name:	Haulmark Industries, Inc. - Special Products Plant
Source Location:	19224 C.R. 8, Bristol, Indiana 46507
County:	Elkhart
SIC Code:	3715
Operation Permit No.:	039-15406-00253
Permit Reviewer:	ERG/EH

The Office of Air Quality (OAQ) has reviewed an application from Haulmark Industries, Inc. relating to the operation of a custom cargo trailer manufacturing plant.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) spray paint booth, identified as E1, constructed in 1995, equipped with one (1) HVLP spray gun, for metal cargo trailer coating, with a maximum capacity of 0.68 units per hour, using dry filters for overspray control, and exhausting to stack S1.

(b) One (1) general assembly area for the assembling of metal cargo trailers, with a maximum capacity of 0.68 units per hour, identified as GE, constructed in 1995, exhausting to general ventilation.

(c) Ten (10) metal inert gas welding stations, constructed in 1995, with a maximum throughput of 0.27 pounds of welding wire per hour per station.

(d) Twenty (27) natural gas space heaters, constructed in 1995, with a total maximum rated capacity of 3.42 MMBtu per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new construction activities included in this permit.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(a) CP 039-4420-00253, issued on May 23, 1995.

All conditions from previous approvals were incorporated into this permit.

Enforcement Issue

(a) IDEM is aware that equipment has been operated prior to receipt of the proper permit. The source received a construction permit (CP 039-4420-00253) for the equipment listed in this Technical Support Document under the condition entitled *Permitted Emission Units and Pollution Control Equipment*. The construction permit was issued May 23, 1995. IDEM sent a letter dated October 31, 1996 to Haulmark Industries notifying the source about it's expiration on October 22, 2001. Haulmark did not apply for the proper permit prior to October 22, 2001 and is out of compliance with 2-6.1-3.

(b) IDEM is reviewing this matter and will take appropriate action. This proposed permit is intended to satisfy the requirements of the operation permit rules.

Stack Summary

Stack ID	Operation	Height (feet)	Diameter (feet)	Flow Rate (acfm)	Temperature (^{0}F)
E-1	HVLP Paint Booth	24	24	12,800	70

Recommendation

The staff recommends to the Commissioner that the operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An application for the purposes of this review was received on March 25, 2002, with additional information received on May 14, 2002, May 23, 2002, and July 31, 2002.

Emission Calculations

See Appendix A of this document for detailed emissions calculations (pages 1 through 7).

Potential To Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA, the department, or the appropriate local air pollution control agency."

Pollutant	Potential To Emit (tons/year)
PM	23.25
PM-10	23.25
SO_2	0.01
VOC	56.42
CO	0.31
NO_x	1.50

HAP's	Potential To Emit (tons/year)
Xylene	2.09
MEK	0.08
Toluene	1.09
MIK	0.08
Ethylbenzene	0.29
Ethylene Glycol	1.05
Cumene	0.06
Methylene Chloride	0.36
Glycol Ethers	0.73
TOTAL	8.0

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 100 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of criteria pollutants is less than 25 tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-6.1.

(c) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is not subject to the provisions of 326 IAC 2-7.

(d) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
PM-10	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Maintenance Attainment
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(b) Elkhart County has been classified as attainment or unclassifiable for all criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2 and 40 CFR 52.21.

(c) Fugitive Emissions
Since this type of operation is not one of the 28 listed source categories under 326 IAC 2-2, 40 CFR 52.21, or 326 IAC 2-3 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Source Status

Existing Source PSD, Part 70 or FESOP Definition (emissions after controls, based on 8,760 hours of operation per year at rated capacity and/or as otherwise limited):

Pollutant	Emissions (ton/yr)
PM	1.40
PM10	1.40
SO_2	0.01
VOC	56.42
CO	0.31
NO_x	1.50

(a) This existing source is not a major stationary source because no attainment regulated pollutant is emitted at a rate of 250 tons per year or more, and it is not in one of the 28 listed source categories.

(b) These emissions were based on the MSOP application submitted by the company.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)
This existing source, including the emissions from this permit CP-039-4420-00253, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,

(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and

(c) any combination of HAPs is less than 25 tons/year.

This status is based on all the air approvals issued to the source.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS)(326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 63) applicable to this source.

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year for Elkhart County. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Opacity Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings)as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of custom cargo trailer manufacturing was constructed prior to July 27, 1997 and will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 8-2-9 (Miscellaneous Metal Coating Operations)

The spray paint booth (E1) is subject to 326 IAC 8-2-9 because metal parts are being coated in the booth, it was existing as of July 1, 1990, and the actual emissions are greater than fifteen (15) pounds per day before add-on controls.

Pursuant to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), the volume weighted average volatile organic compound (VOC) content of coatings applied in the spray paint booth (E1) shall be limited to 3.5 pounds of VOCs per gallon of coating less water, as applied for any calender day, for forced warm air (less than 90EC or 194 EF) dried coatings.

Solvent sprayed from HVLP application equipment in the paint booth (E1) during cleanup or color changes shall be directed into containers. Such containers shall be closed as soon as such solvent spraying is complete, and the waste solvent shall be disposed of in such a manner that evaporation is minimized.

Based on the MSDS submitted by the source and the calculations made, the spray booth (E1) is in compliance with this requirement through a daily volume weighted average pursuant to rule 326 IAC 8-1-2(a)(7).

326 IAC 6-3-2(d) (Particulate)

The spray paint booth (E1) is subject to 326 IAC 6-3-2(d) because it is not one of the exempt surface coating activities in 326 IAC 6-3-2 and the booth uses more than 5 gallons per day. The spray paint booth must meet the following requirements:

(a) Surface coating shall be controlled by a dry particulate filter, waterwash, or an equivalent control device, and the control device shall be operated in accordance with the manufacturer's specifications.

(b) If overspray is visibly detected at the exhaust or accumulates on the ground, the Permittee shall inspect the control device and do either of the following no later than four (4) hours after such observation:

(1) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(2) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

(c) If overspray is visibly detected, the Permittee shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that overspray is not visibly detected at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

326 IAC 6-3-2 (Particulate)

Pursuant to 326 IAC 6-3-1(b)(9), each welding station is not subject to 326 IAC 6-3-2(e) because less than six hundred twenty-five (625) pounds of rod or wire is consumed per day.

326 IAC 8-1-6 (New Facilities; General Reduction Requirements)

The spray paint booth (E1) is subject to 326 IAC 8-2-9 (Miscellaneous Metal Coating Operations), therefore 326 IAC 8-1-6 is not applicable.

Conclusion

The operation of this custom cargo manufacturing plant shall be subject to the conditions of the attached Minor Source Operating Permit 039-15406-00253.

Appendix A: Emissions Calculations
VOC and Particulate
Surface Coating Miscellaneous Production Operations

Company Name: Haulmark Industries, Inc. - Special Products Facility
Address City IN Zip: Bristol, IN 46507
MSOP: 039-15406-00253
Plt ID: 039-00253
Reviewer: ERG/EH
Date: 5/16/02

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Paint Booth															
Daubert Tectyl Black Paint	9.50	40.00%	3.7%	36.3%	4.2%	48.00%	1.99120	0.680	3.45	4.67	112.16	20.47	8.45	7.19	75%
Gray Primer	11.66	29.49%	0.0%	29.5%	0.0%	48.49%	0.15590	0.680	3.44	0.36	8.75	1.60	0.95	7.09	75%
Latex Spray Flat Black	11.30	48.30%	38.3%	10.0%	52.0%	51.70%	0.59190	0.680	1.13	0.45	10.92	1.99	2.57	2.19	75%
Production Areas															
R-900 Windshield Sealant	10.16	30.00%	0.0%	30.0%	0.0%	61.00%	0.06630	0.680	3.05	0.14	3.30	0.60	0.70	5.00	50%
#3 Cleaner (Citrus Cleaner)	7.21	100.00%	0.0%	100.0%	0.0%	0.00%	0.12500	0.680	7.21	0.61	14.71	2.68	0.00	N/A	0%
616 Vulcum Alum Caulk	8.70	40.23%	0.0%	40.2%	0.0%	90.00%	1.29710	0.680	3.50	3.09	74.09	13.52	0.00	3.89	100%
5504 Clear Caulk	8.21	45.46%	0.0%	45.5%	0.0%	48.10%	0.00370	0.680	3.73	0.01	0.23	0.04	0.00	7.76	100%
Permatex Undercoating	7.50	58.40%	0.0%	58.4%	0.0%	41.60%	0.03640	0.680	4.38	0.11	2.60	0.47	0.17	10.53	50%
SPLT Lacquer Thinner	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	0.03680	0.680	7.26	0.18	4.36	0.80	0.00	N/A	0%
Clear Geocel 2300	7.91	35.08%	0.0%	35.1%	0.0%	64.92%	0.05290	0.680	2.77	0.10	2.40	0.44	0.40	4.27	50%
226101 White Geocel	7.91	35.08%	0.0%	35.1%	0.0%	64.92%	0.01240	0.680	2.77	0.02	0.56	0.10	0.09	4.27	50%
2000 Clear Geocel	7.91	35.08%	0.0%	35.1%	0.0%	64.92%	0.01930	0.680	2.77	0.04	0.87	0.16	0.15	4.27	50%
Benders 601 Spray Adhesive, Aerosol	10.41	38.42%	0.0%	38.4%	0.0%	12.00%	0.01820	0.680	4.00	0.05	1.19	0.22	0.17	33.33	50%
Benders Gloss Back Spray Paint, Aerosol	6.10	70.85%	0.0%	70.9%	0.0%	15.00%	0.03310	0.680	4.32	0.10	2.33	0.43	0.09	28.81	50%
Benders White Spray Paint, Aerosol	6.36	85.02%	0.0%	85.0%	0.0%	15.00%	0.00410	0.680	5.41	0.02	0.36	0.07	0.01	36.05	50%
Benders Gray Primer, Aerosol	6.41	62.00%	0.0%	62.0%	0.0%	17.00%	0.00020	0.680	3.97	0.00	0.01	0.00	0.00	23.38	50%
Superhide Flat Base	10.80	78.00%	0.0%	78.0%	0.0%	22.00%	0.06840	0.680	8.42	0.39	9.40	1.72	0.24	38.29	50%
Con-Bond	6.66	81.50%	0.0%	81.5%	0.0%	12.30%	0.23160	0.680	5.43	0.85	20.52	3.74	0.42	44.13	50%
Urethane Gray Roof Sealant	13.02	3.00%	0.0%	3.0%	0.0%	97.00%	0.37130	0.680	0.39	0.10	2.37	0.43	6.98	0.40	50%
C-33 Spray Silicone Spray	5.91	91.75%	0.0%	91.8%	0.0%	5.34%	0.00380	0.680	5.42	0.01	0.34	0.06	0.00	101.54	50%
Break Away	7.46	96.00%	0.0%	96.0%	0.0%	4.00%	0.00180	0.680	7.16	0.01	0.21	0.04	0.00	179.04	50%
Brake and Parts Cleaner	12.00	28.00%	0.0%	28.0%	0.0%	0.00%	0.00500	0.680	3.36	0.01	0.27	0.05	0.06	N/A	50%
Stay-Put Adhesive	6.12	71.00%	0.0%	71.0%	0.0%	27.00%	0.51760	0.680	4.35	1.53	36.70	6.70	1.37	16.09	50%
Aluminum Spray Paint	6.16	85.03%	0.0%	85.0%	0.0%	14.00%	0.00110	0.680	5.24	0.00	0.09	0.02	0.00	37.41	50%
State Potential Emissions			**Add worst case coating to all solvents**						**Totals**	**12.86**	**308.74**	**56.34**	**22.85**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used

NOTE: Particulate emissions after dry filter controls (94% eff.) = 22.85 tpy x 0.06 = 1.4 tpy

Appendix A: Emission Calculations
HAP Emission Calculations
Surface Coating and Miscellanous Production Materials

Company Name: Haulmark Industries, Inc. - Special Products Facility
Address City IN Zip: Bristol, IN 46507
MSOP: 039-15406-00253
Plt ID: 039-00253
Permit Reviewer: ERG/EH
Date: 5/16/02

Material	Density (Lb/Gal)	Gallons of Material (gal/unit)	Maximum (unit/hour)	Weight % Xylene	Weight % Methyl Ethyl Ketone	Weight % Toluene	Weight % Methyl Isobutyl Ketone	Weight % Ethyl Benzene	Weight % Ethylene Glycol	Weight % Cumene	Weight % Methylene Chloride	Weight % Glycol Ethers	Weight % Trichloroethylene	Weight % Methanol	Weight % Hexane	Xylene Emissions (ton/yr)	MEK Emissions (ton/yr)	Toluene Emissions (ton/yr)	MIK Emissions (ton/yr)	Ethyl Benzene Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Cumene Emissions (ton/yr)	Methylene Chloride Emission (ton/yr)	Glycol Ethers (ton/yr)	Trichloroethylene (ton/yr)	Methanol Emissions (ton/yr)	Hexane Emissions (ton/yr)
Paint Booth																											
Daubert Tectyl Black Paint	9.50	1.99120	0.680	1.80%				0.50%								1.014	0.000	0.000	0.000	0.282	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Gray Primer	11.66	0.15590	0.680	17.06%	0.02%	0.19%		0.21%								0.924	0.001	0.010	0.000	0.011	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Latex Spray Flat Black	11.30	0.59190	0.680						5.00%							0.000	0.000	0.000	0.000	0.000	0.996	0.000	0.000	0.000	0.000	0.000	0.000
Production Areas																0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
R-900 Windshield Sealant	10.16	0.06630	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
#3 Cleaner (Citrus Cleaner)	7.21	0.12500	0.680									27.10%				0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.727	0.000	0.000	0.000
616 Vulcum Alum Caulk	8.70	1.29710	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
5504 Clear Caulk	8.21	0.00370	0.680			44.60%										0.000	0.000	0.040	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Permatex Undercoating	7.50	0.03640	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
SPLT Lacquer Thinner	7.26	0.03680	0.680		10.00%	60.00%	10.00%							10.00%		0.000	0.080	0.477	0.080	0.000	0.000	0.000	0.000	0.000	0.000	0.080	0.000
Clear Geocel 2300	7.91	0.05290	0.680	7.00%						3.00%						0.087	0.000	0.000	0.000	0.000	0.000	0.037	0.000	0.000	0.000	0.000	0.000
226101 White Geocel	7.91	0.01240	0.680	7.00%						3.00%						0.020	0.000	0.000	0.000	0.000	0.000	0.009	0.000	0.000	0.000	0.000	0.000
2000 Clear Geocel	7.91	0.01930	0.680	7.00%						3.00%						0.032	0.000	0.000	0.000	0.000	0.000	0.014	0.000	0.000	0.000	0.000	0.000
Benders 601 Spray Adhesive, Aerosol	10.41	0.01820	0.680								55.00%					0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.310	0.000	0.000	0.000	0.000
Benders Gloss Back Spray Paint, Aerosol	6.10	0.03310	0.680	2.50%		19.00%										0.015	0.000	0.114	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benders White Spray Paint, Aerosol	6.36	0.00410	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Benders Gray Primer, Aerosol	6.41	0.00020	0.680	5.00%	2.00%	23.00%	1.00%	1.00%								0.000	0.000	0.001	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Superhide Flat Base	10.80	0.06840	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Con-Bond	6.66	0.23160	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Urethane Gray Roof Sealant	13.02	0.37130	0.680			3.00%										0.000	0.000	0.432	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
C-33 Spray Silicone Spray	5.91	0.00380	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Break Away	7.46	0.00180	0.680													0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Brake and Parts Cleaner	12.00	0.00500	0.680						30.00%		30.00%		30.00%	30.00%		0.000	0.000	0.000	0.000	0.000	0.054	0.000	0.000	0.054	0.054	0.054	0.000
Stay-Put Adhesive	9.90	0.51760	0.680												13.00%	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	1.984
Aluminum Spray Paint	6.16	0.00110	0.680			59.00%										0.000	0.000	0.012	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000
Total State Potentials																**2.09**	**0.08**	**1.09**	**0.08**	**0.29**	**1.05**	**0.06**	**0.36**	**0.73**	**0.05**	**0.13**	**1.98**
																							TOTAL HAP	**8.00**			

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs

Appendix A: Emissions Calculations
Welding and Thermal Cutting

Company Name: Haulmark Industries, Inc. - Special Products Facility
Address City IN Zip: Bristol, IN 46507
CP: 039-15406-00253
Plt ID: 039-00253
Reviewer: ERG/EH
Date: 5/16/02

PROCESS	Number of Stations	Max. electrode consumption per station (lbs/hr)		EMISSION FACTORS* (lb pollutant/lb electrode)				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
WELDING				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Submerged Arc				0.036	0.011			0.000000	0.000000	0.000000	0.000000	0.000000
Metal Inert Gas (MIG)(carbon steel)	10	0.27		0.0241	0.000034	0.000025	0.00001	0.065070	0.000092	0.000068	0.000027	0.000186
Stick (E7018 electrode)				0.0211	0.0009			0.000000	0.000000	0.000000	0.000000	0.000000
Tungsten Inert Gas (TIG)(carbon steel)				0.0055	0.0005			0.000000	0.000000	0.000000	0.000000	0.000000
Oxyacetylene(carbon steel)				0.0055	0.0005			0.000000	0.000000	0.000000	0.000000	0.000000

	Number of Stations	Max. Metal Thickness Cut (in.)	Max. Metal Cutting Rate (in./minute)	EMISSION FACTORS (lb pollutant/1,000 inches cut, 1" thick)**				EMISSIONS (lbs/hr)				HAPS (lbs/hr)
FLAME CUTTING				PM=PM10	Mn	Ni	Cr	PM = PM10	Mn	Ni	Cr	
Oxyacetylene				0.1622	0.0005	0.0001	0.0003	0.000	0.000	0.000	0.000	0.000
Oxymethane				0.0815	0.0002		0.0002	0.000	0.000	0.000	0.000	0.000
Plasma**				0.0039				0.000	0.000	0.000	0.000	0.000
EMISSION TOTALS												
Potential Emissions lbs/hr								0.0651	0.0001	0.0001	0.0000	0.000186
Potential Emissions lbs/day								1.5617	0.0022	0.0016	0.0006	0.004471
Potential Emissions tons/year								0.2850	0.0004	0.0003	0.0001	0.000816

METHODOLOGY

*Emission Factors are default values for carbon steel unless a specific electrode type is noted in the Process column.

**Emission Factor for plasma cutting from American Welding Society (AWS). Trials reported for wet cutting of 8 mm thick mild steel with 3.5 m/min cutting speed (at 0.2 g/min emitted). Therefore, the emission factor for plasma cutting is for 8 mm thick r

Using AWS average values: (0.25 g/min)/(3.6 m/min) x (0.0022 lb/g)/(39.37 in./m) x (1,000 in.) = 0.0039 lb/1,000 in. cut, 8 mm thick

Plasma cutting emissions, lb/hr: (# of stations)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 8 mm thick)

Cutting emissions, lb/hr: (# of stations)(max. metal thickness, in.)(max. cutting rate, in./min.)(60 min./hr.)(emission factor, lb. pollutant/1,000 in. cut, 1" thick)

Welding emissions, lb/hr: (# of stations)(max. lbs of electrode used/hr/station)(emission factor, lb. pollutant/lb. of electrode used)

Emissions, lbs/day = emissions, lbs/hr x 24 hrs/day

Emissions, tons/yr = emissions, lb/hr x 8,760 hrs/year x 1 ton/2,000 lbs.

Welding and other flame cutting emission factors are from an internal training session document.

Refer to AP-42, Chapter 12.19 for additional emission factors for welding.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas Space Heaters

Company Name: Haulmark Industries, Inc. - Special Products Facility
Address City IN Zip: Bristol, IN 46507
MSOP: 039-15406-00253
Plt ID: 039-00253
Permit Reviewer: ERG/EH
Date: 5/16/02

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.42	30.0

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	4.50	7.50	0.60	100.00 **see below	5.50	21.00
Potential Emission in tons/yr	0.07	0.11	0.01	1.50	0.08	0.31

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton
Note: Check the applicable rules and test methods for PM and PM10 when using the above emission factors to confirm that the correct factor is used (i.e., condensable included/not included).

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Natural Gas Space Heaters
HAPs Emissions

Company Name: **Skyline**
Address City IN Zip: **Goshen 46527**
MSOP: **039-12248-00310**
Plt ID: **310**
Reviewer: **ERG/EG**
Date: **07/07/00**

HAPs - Organics

	Benzene	e	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	3.146E-05	1.798E-05	1.123E-03	2.696E-02	5.093E-05

HAPs - Metals

	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	7.490E-06	1.648E-05	2.097E-05	5.692E-06	3.146E-05

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Summary Table

Company Name: **Haulmark Industries, Inc. - Special Products Facility**
Address City IN Zip: **Bristol, IN 46507**
CP: **039-15406-00253**
Plt ID: **039-00253**
Reviewer: **ERG/EH**
Date: **5/16/02**

Potential To Emit in Tons/Year

	PM	PM10	SO2	NOx	VOC	CO	Xylene	MEK	Toluene	MIK	Ethylbenzene	Ethylene Glycol	Cumene	Methylene Chloride	Glycol Ethers
Surface Coating	22.85	22.85	-	-	56.34	-	2.09	0.08	1.09	0.08	0.29	1.05	0.06	0.36	0.73
Welding	0.29	0.29	-	-	-	-	-	-	-	-	-	-	-	-	-
Heaters	0.07	0.11	0.01	1.5	0.08	0.31	-	-	-	-	-	-	-	-	-
Total	**23.21**	**23.25**	**0.01**	**1.5**	**56.42**	**0.31**	**2.09**	**0.08**	**1.09**	**0.08**	**0.29**	**1.05**	**0.06**	**0.36**	**0.73**

Potential To Emit in Tons/Year (cont'd from above)

	Trichloroethylene	Methanol	Hexane	Manganese	Nickel	Chromium	HAPS
Surface Coating	0.05	0.13	1.98	-	-	-	8.00
Welding	-	-	-	0.0004	0.0003	0.0001	0.0008
Heaters	-	-	-	-	-	-	-
Total	**0.05**	**0.13**	**1.98**	**0.0004**	**0.0003**	**0.0001**	**8.00**

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Haulmark Industries, Inc. - Special Products Facility
Address City IN Zip: Bristol, IN 46507
MSOP: 039-15406-00253
Plt ID: 039-00253
Reviewer: ERG/EH
Date: 5/16/02

Material	Density (Lb/Gal)	Weight % Volatile (H20 & Organics)	Weight % Water	Weight % VOC	Volume % Water	Volume % Non-Volatiles (solids)	Gal of Mat. (gal/unit)	Maximum (unit/hour)	Actual VOC per gallon of coating	Actual VOC pounds per hour	Actual VOC pounds per day	Actual VOC tons per year	Particulate (ton/yr)	lb VOC/gal solids	Transfer Efficiency*
Paint Booth															
Daubert Tectyl Black Paint	9.50	40.00%	3.7%	36.3%	4.2%	48.00%	0.4546	0.680	3.45	1.07	25.61	4.67	1.93	7.19	75%
Gray Primer	11.66	29.49%	0.0%	29.5%	0.0%	48.49%	0.0356	0.680	3.44	0.08	2.00	0.36	0.22	7.09	75%
Latex Spray Flat Black	11.30	48.30%	38.3%	10.0%	52.0%	51.70%	0.1351	0.680	1.13	0.10	2.49	0.45	0.59	2.19	75%
Production Areas							0.0000								
R-900 Windshield Sealant	10.16	30.00%	0.0%	30.0%	0.0%	61.00%	0.0151	0.680	3.05	0.03	0.75	0.14	0.16	5.00	50%
#3 Cleaner (Citrus Cleaner)	7.21	100.00%	0.0%	100.0%	0.0%	0.00%	0.0285	0.680	7.21	0.14	3.36	0.61	0.00	N/A	0%
616 Vulcum Alum Caulk	8.70	40.23%	0.0%	40.2%	0.0%	90.00%	0.2961	0.680	3.50	0.70	16.91	3.09	0.00	3.89	100%
5504 Clear Caulk	8.21	45.46%	0.0%	45.5%	0.0%	48.10%	0.0008	0.680	3.73	0.00	0.05	0.01	0.00	7.76	100%
Permatex Undercoating	7.50	58.40%	0.0%	58.4%	0.0%	41.60%	0.0083	0.680	4.38	0.02	0.59	0.11	0.04	10.53	50%
SPLT Lacquer Thinner	7.26	100.00%	0.0%	100.0%	0.0%	0.00%	0.0084	0.680	7.26	0.04	1.00	0.18	0.00	N/A	0%
Clear Geocel 2300	7.91	35.08%	0.0%	35.1%	0.0%	64.92%	0.0121	0.680	2.77	0.02	0.55	0.10	0.09	4.27	50%
226101 White Geocel	7.91	35.08%	0.0%	35.1%	0.0%	64.92%	0.0028	0.680	2.77	0.01	0.13	0.02	0.02	4.27	50%
2000 Clear Geocel	7.91	35.08%	0.0%	35.1%	0.0%	64.92%	0.0044	0.680	2.77	0.01	0.20	0.04	0.03	4.27	50%
Benders 601 Spray Adhesive, Aerosol	10.41	38.42%	0.0%	38.4%	0.0%	12.00%	0.0042	0.680	4.00	0.01	0.27	0.05	0.04	33.33	50%
Benders Gloss Back Spray Paint, Aerosol	6.10	70.85%	0.0%	70.9%	0.0%	15.00%	0.0076	0.680	4.32	0.02	0.53	0.10	0.02	28.81	50%
Benders White Spray Paint, Aerosol	6.36	85.02%	0.0%	85.0%	0.0%	15.00%	0.0009	0.680	5.41	0.00	0.08	0.02	0.00	36.05	50%
Benders Gray Primer, Aerosol	6.41	62.00%	0.0%	62.0%	0.0%	17.00%	0.0000	0.680	3.97	0.00	0.00	0.00	0.00	23.38	50%
Superhide Flat Base	10.80	78.00%	0.0%	78.0%	0.0%	22.00%	0.0156	0.680	8.42	0.09	2.15	0.39	0.06	38.29	50%
Con-Bond	6.66	81.50%	0.0%	81.5%	0.0%	12.30%	0.0529	0.680	5.43	0.20	4.68	0.85	0.10	44.13	50%
Urethane Gray Roof Sealant	13.02	3.00%	0.0%	3.0%	0.0%	97.00%	0.0848	0.680	0.39	0.02	0.54	0.10	1.59	0.40	50%
C-33 Spray Silicone Spray	5.91	91.75%	0.0%	91.8%	0.0%	5.34%	0.0009	0.680	5.42	0.00	0.08	0.01	0.00	101.54	50%
Break Away	7.46	96.00%	0.0%	96.0%	0.0%	4.00%	0.0004	0.680	7.16	0.00	0.05	0.01	0.00	179.04	50%
Brake and Parts Cleaner	12.00	28.00%	0.0%	28.0%	0.0%	0.00%	0.0011	0.680	3.36	0.00	0.06	0.01	0.01	N/A	50%
Stay-Put Adhesive	6.12	71.00%	0.0%	71.0%	0.0%	27.00%	0.1182	0.680	4.35	0.35	8.38	1.53	0.31	16.09	50%
Aluminum Spray Paint	6.16	85.03%	0.0%	85.0%	0.0%	14.00%	0.0003	0.680	5.24	0.00	0.02	0.00	0.00	37.41	50%
State Actual Emissions			**Add worst case coating to all solvents**						**Totals**	**2.94**	**70.49**	**12.86**	**5.22**		

METHODOLOGY

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Actual VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Actual VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Actual VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Actual Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coating + Sum of all solvents used